

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS**  
**Bid Protest**

LOYAL SOURCE GOVERNMENT )  
SERVICES, LLC, )  
Plaintiff, )  
v. )  
UNITED STATES, )  
Defendant. )  
No. 24-1001 C

**PLAINTIFF'S MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL**

Pursuant to Appendix C, Section III.4, of the Rules of the Court of Federal Claims (“RCFC”), Plaintiff, Loyal Source Government Services, LLC (“Loyal Source”), by and through counsel, respectfully requests that this Court file the Complaint and the exhibits attached thereto under seal.

Loyal Source recognizes that Appendix C of the RCFC requires that, when a party files a complaint under seal, it must simultaneously file a proposed redacted version of the complaint. However, Loyal Source’s Complaint contains confidential information that is subject to a protective order issued by the U.S. Government Accountability Office (“GAO”) (No. B-420959.14), which requires that the Government be afforded an opportunity to review redacted versions of documents prior to their public release. Accordingly, to ensure compliance with the GAO’s protective order, Loyal Source will circulate a proposed redacted version of its Complaint to Government counsel. Thereafter, assuming agreement with the Government, Loyal Source will file a public, redacted version with the Court.

Accordingly, Loyal Source respectfully requests that its Complaint, as well as the exhibits attached thereto, be filed under seal.

Respectfully submitted,

s/Samuel B. Knowles  
Samuel B. Knowles  
DLA Piper LLP (US)  
500 Eighth Street, NW  
Washington, DC 20004  
Tel: (202) 799-4404  
Fax: (202) 799-5404  
E-mail: sam.knowles@us.dlapiper.com

*Counsel for Loyal Source Government Services, LLC*

Of Counsel:

Thomas E. Daley  
Christie M. Alvarez  
David R. Lacker  
DLA Piper LLP (US)

Dated: June 28, 2024

## **CERTIFICATE OF FILING**

I hereby certify that on June 28, 2024, a copy of the foregoing was filed using the Court's ECF system. I understand that notice of this filing will be served on the counsel to the parties to this case via the Court's ECF system.

Respectfully submitted,

s/Samuel B. Knowles  
Samuel B. Knowles  
DLA Piper LLP (US)  
500 Eighth Street, NW  
Washington, DC 20004  
Tel: (202) 799-4404  
Fax: (202) 799-5404  
E-mail: sam.knowles@us.dlapiper.com

*Counsel for Loyal Source Government Services, LLC*